

MARKOWITZ GRAVELLE, LLP

3131 Princeton Pike
Bldg. 3D, Suite 200
Lawrenceville, NJ 08648
Tel: (609) 896-2660 Fax: (609) 896-3184
www.mgs-law.com
www.mgs-pi-law.com

Joseph Markowitz
Joshua Markowitz*
Christine M. Gravelle**

Direct Dial: Ext.231
E-mail: modonnell@mgs-law.com

Michael J. O'Donnell*
Kimberly Gandy Jinks

*Also admitted in PA
**Also admitted in RI & MA

September 8, 2009

Robert A. Obler
Of Counsel
Certified by the Supreme Court of New Jersey
As a Criminal Trial Attorney

Honorable Jose L. Linares, U.S.D.J.
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: United States v. John J. Hamilton, Jr.
Crim. No.: 08-876

Dear Judge Linares:

On September 4, 2009, defendant, John Hamilton, filed a Motion for a New Trial, which alleged that Mr. Hamilton's former counsel's simultaneous representation of him and an entity with which he had an adverse relationship resulted in a conflict that violated Mr. Hamilton's Sixth Amendment rights. During the preparation of that motion and present counsel's conversations with Mr. Hamilton in that regard, it came to our attention that an additional post-trial motion is required. While Mr. Markowitz and myself have devoted a considerable amount of time to Mr. Hamilton's matter, given that we were not trial counsel and the voluminous file in this matter, it has been difficult to ascertain exactly what motions need to be filed. Accordingly, defendant is respectfully requesting that the Court allow him until September 25, 2009 to file this additional motion.

Respectfully,

/s/ Michael J. O'Donnell

Michael J. O'Donnell

MJO/mjo

c: Joyce Malliet, AUSA

SO ORDERED:
DATED: 9-8-09

